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**PUC DOCKET NO. 48785
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BEFORE THE FILING CLERK

JOINT APPLICATION OF ONCOR	§	
ELECTRIC DELIVERY COMPANY	§	
LLC AND AEP TEXAS INC. TO	§	
AMEND THEIR CERTIFICATES OF	§	
CONVENIENCE AND NECESSITY FOR	§	PUBLIC UTILITY COMMISSION
A DOUBLE CIRCUIT 345-KV	§	
TRANSMISSION LINE IN PECOS,	§	
REEVES, AND WARD COUNTIES,	§	
TEXAS (SAND LAKE TO SOLSTICE)	§	OF TEXAS

APPLICANTS' EXCEPTIONS TO THE PROPOSAL FOR DECISION

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COME NOW Oncor Electric Delivery Company LLC ("Oncor") and AEP Texas Inc. ("AEP Texas") (together, the "Applicants") and timely file their Exceptions to the Proposal for Decision ("PFD") regarding the Sand Lake – Solstice 345 kV transmission line project on or before April 23, 2019, pursuant to the letter from the Commission's Office of Policy & Docket Management filed on April 11, 2019.

Applicants take this opportunity to clarify the record with respect to Plains Pipeline's proposed modification to Link B2. The PFD recommends adoption of this proposed modification, which would parallel the western side of a natural gas pipeline easement wholly within Plains Pipeline's property (CCN tract number 492).¹ Applicants do not oppose this proposed modification, which moves the line further away from habitable structures located on the property to the west (CCN tract number 474). The PFD assumes there would be no increased cost associated with this modification.² Though Applicants did not have the opportunity to formally evaluate or introduce record evidence on the estimated cost impact this proposed modification would have, the PFD correctly notes that the modification would slightly decrease overall line length while requiring two approximately 45-degree turns—the first departing from original Link B2 to begin paralleling the pipeline, and the second to re-connect with original Link B2 near the southern

¹ PFD at 1-2, 7-9, n.25, 32, & 35.

² PFD at 35 ("The ALJs assume that this modification would not increase the cost of Link B2 and Route 320 because it is essentially using the hypotenuse of a right triangle as its length, rather than the two legs of the right triangle. It does involve two angled turns in the line, but avoids a 90-degree turn that otherwise exists on the unmodified Link B2.").

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corner of tract 492—rather than one 90-degree turn near the western corner of tract 492 as originally proposed.³ On balance, Applicants expect this modification would slightly increase project costs due to the additional turning structures required to implement the modification.

Applicants thank the administrative law judges for their consideration of this project and for issuing a PFD recommending project approval along route 320. Applicants look forward to the Commission's consideration of this project and will be available to answer any questions.

³ *Id.*

Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been hand-delivered or sent via courier service, email, fax, overnight delivery, or first class United States mail, postage prepaid, to all parties of record in this proceeding, on the 23rd day of April, 2019.

A handwritten signature in black ink, appearing to read "W. M. Smith", is written over a horizontal line.